

EXHIBIT B

Maria L. Nixon

From: Molshree Gupta
Sent: Thursday, April 13, 2023 9:59 AM
To: Thomas Ferlauto
Cc: Spencer Carter; Patrick Stockalper; Maria L. Nixon
Subject: RE: 610-2: Assiff, Joshua vs. County of Los Angeles, et al.
Attachments: Def NOD of Plaintiff Joshua Assiff (final).PDF

Good morning, Counsel:

We are preparing further documents and disclosures for service today.

Yes, Plaintiff's deposition is proceeding tomorrow at our office in El Segundo as noticed. See attached for ease of reference.

AS previously mentioned, he is out on medical leave; we just learned that he is due for re-evaluation on June 1, 2023; we do not know when he will be cleared to return to work.

- We will prepare a motion to continue trial (and related dates) based on party unavailability;
- Will you agree to stipulate in support of our motion?

Thanks,



Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Thursday, April 13, 2023 9:29 AM
To: Molshree Gupta <mgupta@kmslegal.com>
Cc: Spencer Carter <scarter@kmslegal.com>; Patrick Stockalper <pstockalper@kmslegal.com>; Maria L. Nixon <mnixon@kmslegal.com>
Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al.

Counsel:

Is the Plaintiff's deposition going forward tomorrow? If so, where and what time?

It was our understanding that COLA would produce the documents responsive to the request for production of documents yesterday. However, only documents responsive to category 8 were produced. Where are the documents responsive to categories 1 through 7?

Finally, we have a discovery cut-off of May 10. Kelly is scheduled for 4/25 and COLA is scheduled for 4/26. Before we can move those dates, we need to select a mutually agreeable alternative. Please provide me with alternative dates.

Thank you,

Thomas M. Ferlauto

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THOMAS M. FERLAUTO
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On Apr 12, 2023, at 10:17 AM, Thomas Ferlauto <tmf@lawofficetmf.com> wrote:

Well, please get back to me when you have dates that we can discuss, hopefully ASAP.

I understand that you will be making a production of documents today. Is that correct?

Our understanding is that you will produce documents today and Plaintiff would sit for his deposition on Friday. Is that still our deal?

Also where and when will the deposition be conducted?

Thanks,

Tom

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On Apr 12, 2023, at 9:24 AM, Molshree Gupta <mgupta@kmslegal.com> wrote:

Good morning:

I very recently learned that Sgt. Kelly is currently out on medical leave. I am trying to get more info on his return date from the County, but that one likely cannot proceed as currently noticed.

On the County NOD, you have two conflicting dates listed. 4/25 does not work for me, and I will need to check with the County re 4/26.

- Relatedly, please advise your availability to meet and confer about category no. 9 (compliance with the Settlement Agreement entered in USDC Case No. CV-15-03174).
- As you know, this matter arises out of the Santa Clarita Valley LASD station, not the Antelope Valley stations.

Thanks,
<image001.jpg>

Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Tuesday, April 11, 2023 3:53 PM
To: Molshree Gupta <mgupta@kmslegal.com>
Cc: Spencer Carter <scarter@kmslegal.com>; Patrick Stockalper <pstockalper@kmslegal.com>
Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al.
Importance: High

Counsel:

What would you like to do with the depositions of Kelly and COLA? Do you want to keep them as currently set? Or schedule them for a more convenient date?

We would be willing to do Kelly's deposition on a Saturday 4/22, 4/29 or 5/6 if that would work with the Sergeant's calendar.

Please let me know.

Thanks,

Tom

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On Apr 10, 2023, at 9:31 AM, Molshree Gupta <mgupta@kmslegal.com> wrote:

Counsel:

We are not in receipt of all documents that Plaintiff indicated he would produce more than a month ago. Please advise as to status of the further document production, or, in the alternative, advise re your availability for a Zoom or phone meet and confer in the upcoming week.

Thanks,
<image001.jpg>

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<Pltf Resp. to RFP#1 by Def COLA.pdf>